Procedures for Restricted Party Screenings

The US government maintains lists of individuals and entities that are restricted or prevented from working in certain domains, including exports. Wright State University has an active export compliance (EC) program and conducts Restricted Party Screening (RPS) as one part of its EC program. Screenings are performed by several departments on campus primarily to review the following:

- All employment finalists
- All vendors, subcontractors, and consultants
- Research collaborators
- All personnel associated with export controlled research
- Foreign visiting scholars, H1-B visa applicants

Wright State subscribes to an online software service called Visual Compliance to conduct RPS. The Export Compliance Officer (ECO) manages user access to Visual Compliance. Anyone seeking to have an account with Visual Compliance must contact the ECO at exportcompliance@wright.edu.

Visual Compliance Best Practices and Procedures

**Individual and Company Screening** searches for the name of an individual or a company against government restricted party lists. The manual entry of the names of individuals or companies and the selection of search parameters determine the results, which can vary widely depending on those selections.

Using both the name and company fields for a search does not perform two searches at once. Screening the name of the individual and the company should be completed as separate screens.
SCREENING INSTRUCTIONS

2. Log in using your log in (email address) and password that you created.
3. You will then come to a main menu screen. Select “RESTRICTED PARTY SCREENING”.
4. Enter the full name of the person you are screening in the Name field or the entire name of the institution/company (e.g. vendor, sponsor, or collaborator) in the Company field. It is not necessary to enter the full address for the party being screened, however it is recommended to enter city, state, and/or country.

5. Using the drop-down arrow in the Comment box, select the most appropriate explanation for conducting the screening. Enter a brief description of the purpose of the screening in the box (e.g. service agreement, award). This information will appear on the screening result for record keeping and reference purposes to the screener.

6. Below the comment box are the search parameters. Select the Fuzzy level radio button below the comment boxes and select “2” from the drop-down box (Our standard procedure is to screen parties using the “Fuzzy Level 2” criteria). The Fuzzy Level search will ensure a more comprehensive screening because it looks for words with letters that resemble those searched, compensating for minor spelling errors.

7. Make sure the other radio buttons are selected on the screen:
   - Stemming: Adjusts for word endings (e.g. –ed, –ing), returning results containing the “root” of the word
   - Thesaurus: Accounts for variations in form and style for geographic place names (e.g. UK, United Kingdom) and possible variations of proper names (e.g. Bob, Robert, Bobby)
• Field Specific: Prevents name and company keywords from being searched in the “Notes” field
• Remove business endings and abbreviations: Strips business declarations

8. Once all information has been entered (e.g., name or company, comment information, fuzzy level 2 selected), click the “Screen” button to conduct the screening. 9. A result screen will immediately appear. The Visual Compliance System allows you to either email the result or print it for auditing/record keeping purposes.

SCREENING RESULTS

The result screen will either display a “NO MATCHING RECORDS FOUND” result or a listing of any matching records.

• Each matching record will have a reference number that serves as a direct link to detailed information about the specific match found, including the list on which the name appears and the reason for the restriction.
• Alert levels indicate the number of fields found in the Restricted Party Screening (RPS) database matching the keywords supplied in the search criteria.
• The more search criteria fields supplied with keywords for the search the higher the alert level. As in the example below, the fuzzy search resulted in only one potential match on the name “Boeing” and therefore, the alert level is one.

IF YOU RECEIVE A "HIT" OR MATCH ON THE PERSON OR ENTITY

1. Do an “exact” search using the full name. If you still receive a hit from Visual Compliance (VC), compare the physical addresses (i.e., if you know the person is from the United Kingdom, and you have a hit which says the person is from California, it is probably not the same person). If no location is listed or the locations are the same, look at the birthday of the person screened and compare.
2. If you receive a re-screening “hit” notice from VC, look at the comment section as a reminder as to why the person/entity was initially screened. Also compare the name you initially screened against the names of the “hits” that VC lists below the screen. Because VC screens at a high “fuzzy” level, it is not uncommon for several names to be
3. Notify the export control office of a true “hit” or if you need assistance in making a determination at exportcompliance@wright.edu.

4. The export control office will verify any positive “hits” by reviewing the results, the appropriate agency list, and contacting Visual Compliance if necessary.

5. **No payments should be given to or contracts signed with any person or entity positively identified on one of the lists until it has been cleared through the University Export Compliance Officer.**

6. If the “hit” is verified and the University has already conducted transactions with that person or entity, the Office of Research Compliance will notify the screening department and the Office of General Counsel.

7. A determination will then be made as to the next course of action which could include filing a disclosure of a violation to the agency that maintains the list and removing the individual from a project (if applicable).

With any questions, please contact the Export Control Officer at exportcompliance@wright.edu or (937) 775-3853.